

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Defense Distributed,
Second Amendment Foundation,
Firearms Policy Coalition, Inc.,
Firearms Policy Foundation,
The Calguns Foundation,
California Association of Federal
Firearms Licensees, Inc., and
Brandon Combs

Plaintiffs,

v.

Gurbir S. Grewal, Attorney General of the
State of New Jersey,

Defendant.

CIVIL ACTION NO.: 19-CV-04753

DECLARATION OF KEVIN
MADORE

I, Kevin Madore, declare as follows:

1. I am a Detective and have been employed by the New Jersey Division of Criminal Justice (DCJ) for two and a half years. I am currently assigned to the Financial and Computer Crimes Bureau, Computer Crimes Unit. My responsibilities include forensic analysis on seized items such as computers and cellular devices and advanced investigations of potential criminal activities that occur on the dark web and/or that involve crypto currency or the use of V.P.N./proxy servers. As part of my duties, I received training in the areas of Computer/Cellphone forensic examinations, dark web investigations, and Network intrusion investigations. I currently have thirteen years of related experience in the field, previously working in a county prosecutor's office and private industry.

2. On Thursday, February 7, 2019, I received an email from DCJ Lieutenant Edward Augustyn regarding the website codeisfreespeech.com. Codeisfreespeech.com is hosted¹ by the company Cloudflare, Inc. (Cloudflare).

3. I learned that on February 2, 2019, a complaint was sent to Cloudflare via a web form that demanded codeisfreespeech.com remove certain files from their website. The author of the complaint supplied the email address “dcjtipline@njdcj.org,” the name “New Jersey Office of the Attorney General,” and the telephone number of “609-984-6500.” This phone number and email address are publicly available on the DCJ website.

4. On Friday, February 8, 2019, another DCJ Detective and I were assigned to investigate the origin of the complaint.

5. On Friday, February 8, 2019, I requested Internet Protocol (I.P.)² logs from Cloudflare regarding the complaint. Cloudflare responded to that request the same day and provided information regarding the I.P. address that sent the notice. Cloudflare identified that this I.P. address was affiliated with a company based in the Slovak Republic.

6. Using IPlocation.net, an open source website that is commonly used (including by DCJ) to geolocate I.P. addresses, I learned that the I.P. address resides in the Slovak Republic. Using other open source tools, I confirmed that the geolocation was the Slovak Republic. Also, I confirmed that this I.P. address is reserved for that provider based in the Slovak Republic.

7. Based upon this investigation, as well as my training and experience, the complaint sent to Cloudflare regarding codeisfreespeech.com did not originate from the New Jersey Office of Attorney General or its Division of Criminal Justice.

¹ Web hosting is a service that allows organizations and individuals to post a website or web page onto the Internet.

² An Internet Protocol address is a numerical label assigned to every device that connects to a computer network and uses the Internet Protocol for communication.

8. I declare under penalty of perjury that the foregoing is true and correct.

/s/ Kevin Madore

Detective Kevin Madore
N.J. Division of Criminal Justice